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Robert J. Lemons

Attorneys for Lehman Brothers Holdings Inc. and

Certain of Its Affiliates

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS OBJECTIONS SCHEDULED FOR HEARING ON NOVEMBER 20, 2012

TO THE HONORABLE JAMES M. PECK UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "<u>Debtors</u>"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of LBHI and its Affiliated Debtors (the "Plan Administrator"), filed the following motions

and omnibus claims objections (collectively, the "<u>Claims Objections</u>") with the Court for hearing on or before November 20, 2012:

- (a) Three Hundred Fifty-Ninth Omnibus Objection to Claims (Amended and Superseded Claims) [ECF No. 31315]
- (b) Three Hundred Sixty-Third Omnibus Objection to Claims (Reduce and Allow Claims) [ECF No. 31325]
- (c) Three Hundred Sixty Fourth Omnibus Objection to Claims (No Liability Claims) [ECF No. 31326]
- 2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the "Response Deadline") for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.
- 3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan Administrator by any of the holders of the claims included on Exhibit 1 to any of the Orders attached hereto, which include only the proofs of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors, by holders of certain proofs of claim included on the Claims Objections. The hearing on the Claims Objections as to any proof of claim for which a response was either filed

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on the docket or received by the Debtors, and which objection has not been resolved, has been

adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request

that the proposed orders granting the Claims Objections annexed hereto as Exhibits A through C,

which, except for the inclusion of additional language to indicate that such order is supplemental

to a previously entered order for a Claim Objection or to reference the inclusion of separate

exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is

granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be

entered in accordance with the procedures described in the Second Amended Case Management

Order.

I declare that the foregoing is true and correct.

Dated: November 19, 2012 New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

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Attorneys for Lehman Brothers Holdings Inc. and

Certain of Its Affiliates

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EXHIBIT A (Proposed Order – ECF No. 31315)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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ORDER GRANTING THREE HUNDRED FIFTY NINTH OMNIBUS OBJECTION TO CLAIMS (AMENDED AND SUPERSEDED CLAIMS)

Upon the three hundred fifty ninth omnibus objection to claims, dated July 9, 2012 (the "Three Hundred Fifty Ninth Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc. ("LBHI" and the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), in accordance with section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the Amended and Superseded Claims on the basis that such claims have been amended and superseded by the corresponding Surviving Claims, all as more fully described in the Three Hundred Fifty Ninth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Fifty Ninth Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Three Hundred Fifty Ninth Omnibus Objection to Claims; and (vi) all other parties entitled to

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Fifty Ninth Omnibus Objection to Claims.

notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Fifty Ninth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Fifty Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Fifty Ninth Omnibus

Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto under the heading "Claims to be Disallowed and Expunged" (collectively, the "Amended and Superseded Claims") are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the claims listed on <u>Exhibit 1</u> annexed hereto under the heading "Surviving Claims" (collectively, the "<u>Surviving Claims</u>") will remain on the claims register subject to the Plan Administrator's right to further object as set forth herein; and it is further

ORDERED that all information included on and all documentation filed in support of any Amended and Superseded Claim, including, but not limited to, derivative and guarantee questionnaires and supporting documentation, shall be treated as having been filed in support of and included in the corresponding Surviving Claim; and it is further

ORDERED that nothing in this Order or the disallowance and expungement of the Amended and Superseded Claims constitutes any admission or finding with respect to any of the 08-13555-mg Doc 32177 Filed 11/19/12 Entered 11/19/12 15:38:12 Main Document Pg 7 of 23

Surviving Claims, and the Plan Administrator's rights to object to the Surviving Claims on any basis are preserved; *provided, however*, that notwithstanding anything herein to the contrary, the Plan Administrator may not object to a Surviving Claim that is listed on <u>Exhibit 1</u> annexed hereto to the extent that it has been allowed by order of the Court or allowed pursuant to a signed settlement or termination agreement authorized by the Court; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Three Hundred Fifty Ninth Omnibus Objection to Claims under the heading "Claims to be Disallowed and Expunged" that is not listed on Exhibit 1 annexed hereto and (ii) any Surviving Claim; provided, however, that if the Court subsequently orders that a Surviving Claim did not appropriately amend and supersede the corresponding Amended and Superseded Claim, then the claims agent shall be authorized and directed to immediately reinstate such Amended and Superseded Claim (the "Reinstated Claim") and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated:	, 2012	
	New York, New York	
		UNITED STATES BANKRUPTCY HIDGE

EXHIBIT 1

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OMNIBUS OBJECTION 359: EXHIBIT 1 - AMENDED CLAIMS

		CLAIMS TO B	E DISALLOV	VED	SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
1	ING USA ANNUITY & LIFE INSURANCE COMPANY C/O ING INVESTMENT MANAGEMENT LLC ATTN: A. APONTE 230 PARK AVENUE NEW YORK, NY 10169	09/10/2009	08-13555 (JMP)	11151	\$3,569,307.93	ING USA ANNUITY AND LIFE INSURANCE COMPANY C/O ING INVESTMENT MANAGEMENT CO. ATTN: GERALD LINS, GEN. COUNS., ARMOND APONTE, VP AND COUNS. 230 PARK AVENUE NEW YORK, NY 10169	09/22/2009	08-13555 (JMP)	27881	\$14,888,737.41*
2	STARK MASTER FUND LTD. ATTN: MARTHA TSUCHIHASHI C/O STARK OFFSHORE MANAGEMENT, LLC 2600 SOTH LAKE DRIVE ST. FRANCIS, WI 53235	09/18/2009	08-13555 (JMP)	18184	\$13,948,950.00	STARK MASTER FUND LTD. ATTN: MARTHA TSUCHIHASHI C/O STARK OFFSHORE MANAGEMENT, LLC 3600 SOUTH LAKE DRIVE ST. FRANCIS, WI 53235	09/19/2009	08-13555 (JMP)	19542	\$13,948,950.00

TOTAL \$17,518,257.93 EXHIBIT B (Proposed Order – ECF No. 31325)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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ORDER GRANTING THREE HUNDRED SIXTY-THIRD OMNIBUS OBJECTION TO CLAIMS (REDUCE AND ALLOW CLAIMS)

Upon the three hundred sixty third omnibus objection to claims, dated July 9, 2012 (the "Three Hundred Sixty Third Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to reduce and allow the Reduce and Allow Claims, as more fully described in the Three Hundred Sixty Third Omnibus Objection to Claims; and due and proper notice of the Three Hundred Sixty Third Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Three Hundred Sixty Third Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Three Hundred Sixty Third Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Sixty Third Omnibus Objection to Claims.

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ORDERED that the relief requested in the Three Hundred Sixty Third Omnibus

Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Reduce and Allow Claim listed on Exhibit 1 annexed hereto

is reduced and allowed in the amount and priority set forth on Exhibit 1 under the column

headings "Modified Amount" and "Modified Class," and any asserted amounts in excess of the

reduced amount are disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the

validity, allowance, or disallowance of, and all rights to object and defend on any basis are

expressly reserved with respect to any claim listed on Exhibit A to the Three Hundred Sixty

Third Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is

further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

Dated: ______, 2012

New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

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IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 363: EXHIBIT 1 - REDUCE AND ALLOW CLAIMS

ASSERTED MODIFIED FILED NAME CLAIM# DATE **DEBTOR CLASS AMOUNT DEBTOR CLASS AMOUNT** 1 BROWN BROTHERS 5806 07/21/2009 **Lehman Brothers** Unsecured \$95,649.52 **Lehman Brothers** \$92,585.40 Unsecured HARRIMAN & CO. Holdings Inc. Holdings Inc. F/B/O BROWN **BROTHERS** HARRIMAN TRUST CO. LTD AS TTEE OF THE **GOLDMAN SACHS** INVESTMENT TRUST **UNIT GS YEN LIBOR** PLUS FUND ATTN: OFFICE OF THE **GENERAL COUNSEL 40 WATER STREET BOSTON, MA 02119** LB 2080 Kalakaua 2 CB RICHARD ELLIS 27440 09/22/2009 Administrative \$40,357.33 LB 2080 Kalakaua Unsecured \$22,039.29 1003 BISHOP ST **Owners LLC** Unsecured Owners LLC **SUITE 1800** \$22,039.29 HONOLULU, HI 96813 Subtotal \$62,396.62 **TOTAL** \$158,046.14 TOTAL \$114,624.69

EXHIBIT C (Proposed Order – ECF No. 31326)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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ORDER GRANTING THE THREE HUNDRED SIXTY-FOURTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)

Upon the three hundred sixty-fourth omnibus objection to claims, dated October 11, 2012 (the "Three Hundred Sixty-Fourth Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the "Chapter 11 Estates"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the "Procedures Order"), seeking disallowance and expungement of the No Liability Claims to the extent that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Three Hundred Sixty-Fourth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Sixty-Fourth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Sixty-Fourth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest

³ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Sixty-Fourth Omnibus Objection to Claims.

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and that the legal and factual bases set forth in the Three Hundred Sixty-Fourth Omnibus

Objection to Claims establish just cause for the relief granted herein; and after due deliberation
and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Three Hundred Sixty-Fourth Omnibus

Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the "No Liability Claims") are disallowed and expunged, with prejudice, to the extent set forth therein; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Three Hundred Sixty-Fourth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto and (ii) the portion of any No Liability Claim that is not the subject of the Three Hundred Sixty-Fourth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated:	, 2012	
New Yo	ork, New York	
		UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

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NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1 ARK. PUBLIC EMPLOYEES RETIREMENT SYSTEM 124 W CAPITOL AVE., STE 400 LITTLE ROCK, AR 72201	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32388	\$541.24	Claim 32388 reflects that the claim is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
2 CURRENT COMMUNICATIONS & 2600 W. 23RD STREET BROADVIEW, IL 60155	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/27/2009	6182	\$43,797.94	The Debtors' records reflect that Claim 6182 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
3 DEUTSCHE BANK AG ATTN: CHIP GOODRICH, ESQ. 60 WALL STREET NEW YORK, NY 10005-2858	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	26969	\$6,089.75*	The portion of Claim 26969 in the amount of \$6,089.75 relates to a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions. The remaining portion of Claim 26969 is not being expunged pursuant to this Objection and is not affected by this Objection. All rights with respect to the remaining portion of Claim 26969 are reserved.
4 DIALOGIC COMMUNICATIONS CORPORATION 117 SEABOARD LN STE D100 FRANKLIN, TN 37067-2871	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12/05/2008	1232	\$8,650.74	The Debtors' records reflect that Claim 1232 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
5 FORBES CONSULTING GROUP, LLC GARY E. BLUMENHAL, CPA 24 HARTWELL AVE, 3RD FLOOR LEXINGTON, MA 02421	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/23/2008	14	\$8,000.00	The Debtors' records reflect that Claim 14 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6	KONICA MINOLTA DANKA IMAGING COMPANY FKA DANKA OFFICE IMAGING COMPANY ATTN LEE ACEVEDO 11101 ROOSEVELT BLVD. ST PETERSBURG, FL 33716	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/06/2008	140	\$7,147.69	The Debtor's records reflect that claim 140 is based on a transaction or transactions between claimant, on the one hand, and Lehman Brothers Inc., a non-Debtor entity, and/or possibly other non-Debtor entities, on the other hand. The Debtors have no liability to claimant for such transaction or transactions.
7	LOWRY, R.K. JR ATTN: DAVID R. DEARY L-FALLING CREEK LLC LMC RECOVERY FUND LLC LOEWINSOHN FLEGLE DEARY DALLAS, TX 75251	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	32694	\$1,834,333.33	Claimant does not assert any contractual or legal basis on which claimant is entitled to collect on the grounds asserted in the claim.
8	MBS ENERGY GROUP LLC 525 7TH AVE SUITE 1713 NEW YORK, NY 10018	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/25/2008	25	\$28,227.50	The obligations alleged in this claim have been satisfied by Barclays Capital Inc. through payments made to the claimant after September 15, 2008 (the "Commencement Date").
9	MERRILL CORPORATION ONE MERRILL CIRCLE SAINT PAUL, MN 55108	08-13555 (JMP)	Lehman Brothers Holdings Inc.	04/20/2009	3850	\$25,525.00	The Debtors' records reflect that Claim 3850 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
10	MOFFITT, JOHN P ATTN: DAVID R. DEARY J-JASON, LLC LMC RECOVERY FUND LOEWINSOHN FLEGLE DEARY DALLAS, TX 75251	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	32692	\$1,825,833.00	Claimant does not assert any contractual or legal basis on which claimant is entitled to collect on the grounds asserted in the claim.

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
11	MUNI CENTER, LLC, THE JULIA DEPTULA, DIR., CLIENT SVCS. 825 THIRD AVENUE, 14 FL NEW YORK, NY 10022	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/02/2009	1562	\$5,905.47	Claim 1562 reflects that the claim is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
12	RIPLEY, ROBERT & FRANCES ATTN: DAVID R. DEARY CARY INVESTMENTS, LLC C/O DAVID R. DEARY LOEWINSOHN FLEGLE DEARY DALLAS, TX 75251	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	32693	\$2,872,115.00	Claimant does not assert any contractual or legal basis on which claimant is entitled to collect on the grounds asserted in the claim.
13	RITZ CARLTON HOTEL COMPANY THE RITZ-CARLTON BUCKHEAD 3434 PEACHTREE ROAD N.E. ATLANTA, GA 30326	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/14/2009	5328	\$20,900.55	The Debtors' records reflect that Claim 5328 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
14	RUSSELL A. CHABAUD AND RELATED ENTITIES C/O DAVID R. DEARY LOEWINSOHN FLEGLE DEARY 12377 MERIT DRIVE, #900 DALLAS, TX 75251	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	33666	\$1,815,933.33	Claimant does not assert any contractual or legal basis on which claimant is entitled to collect on the grounds asserted in the claim.
15	SECURE FINANCIAL SERVICES C/O JAMES BUSHEY 97 BLAKELY ROAD, SUITE 107 COLCHESTER, VT 05446	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30548	\$10,267.50	The Debtors' records reflect that Claim 30548 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
16	SENECA CENTER KEN BERRICK 2275 ARLINGTON DRIVE SAN LEANDRO, CA 94578	08-13555 (JMP)	Lehman Brothers Holdings Inc.	04/20/2009	3835	\$1,113,148.88	This claim relates to an alleged obligation of SCC Acquisitions, Inc. ("SunCal") or an affiliate of SunCal, neither of which is a Debtor in these chapter 11 cases. LBHI has no liability to claimant for such obligation.

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
17	TEVA PHARMACEUTICAL WORKS PRIVATE LIMITED COMPANY ATTN: LAURENCE SCHOEN, ESQ. C/O MINTZ LEVIN ONE FINANCIAL CENTER BOSTON, MA 02111	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28221	\$69,666.50*	Claim 28221 is for unmatured interest, which is disallowed pursuant to Section 502(b)(2) of the Bankruptcy Code.
18	WOODTRONICS 110 REYNOLDS STREET SOUTH WILLIAMSPORT, PA 17702	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/10/2009	7885	\$21,072.44	The Debtors' records reflect that Claim 7885 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
19	LIM, GIOK KWEE 802 THOMSON ROAD #17-05 , 298187 SINGAPORE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18567	\$294,000.00	Claims 18567, 18569, and 25587 were filed as guarantee claims against LBHI by holders (the "Noteholders") of structured notes (the "Notes") issued by Minibond Limited (the "Issuer") pursuant to a Secured Note Program
20	LIM, GIOK KWEE 802 THOMSON ROAD #17-05 , 298187 SINGAPORE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18569	\$395,087.00	registered by the Monetary Authority of Singapore on March 30, 2006 (the "Program"). However, the Noteholders have not provided any evidence with their proofs of claim to show that LBHI

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IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 364: EXHIBIT 1 – NO LIABILITY CLAIMS

		NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
21	MEE NG, JIM NO 2, #04-01, SIMEI RISE , 528800 SINGAPORE		08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25587	\$30,000.00	issued a valid and enforceable guarantee of the Notes. The Noteholders neither submitted a Guarantee Questionnaire nor provided any evidence of a guarantee of the Notes by LBHI. Moreover, the Base Prospectus for the Program, dated March 30, 2006, explicitly states that "The Notes will solely be obligations of the Issuer and will not be guaranteed or insured by, or be the responsibility of, any other entityThe Notes will not be obligations of, and will not be guaranteed or insured by, any of the Transaction Participants (as defined herein), in particular [LBHI]." Accordingly, LBHI has no liability on account of the Notes.
			-			TOTAL	¢10.40C.040.0C	

TOTAL \$10,436,242.86